

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:09-CR-216-FL

UNITED STATES OF AMERICA)	
)	
v.)	DEFENDANT'S MOTION
)	FOR DOWNWARD DEPARTURE
ZIYAD YAGHI,)	OR VARIANCE
Defendant.)	

COMES NOW, the Defendant, Ziyad Yaghi, by and through his undersigned counsel of record, and moves this Honorable Court to depart or grant a variance.

In support of this Motion, the Defendant would incorporate the factors outlined in the Sentencing Memorandum and Statement of Facts filed contemporaneously herewith.

WHEREFORE, the Defendant prays the court to depart from the guidelines and render a sentence below the guideline range.

Respectfully submitted this the 3rd day of January, 2012.

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Criminal – Appointed

CERTIFICATE OF SERVICE

This is to certify that the undersigned has personally served a copy of the forgoing Motion for Downward Departure or Variance, according to the applicable Civil Procedure Rules of this Court, to wit:

X CM/ECF (U.S. District Courts; U.S. Courts of Appeal)

Date: January 3, 2012

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